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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

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IN RE:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

As representative of

THE COMMONWEALTH OF PUERTO RICO, et  
at.,

DEBTORS

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

POC No. 11823

This filing relates to the  
Commonwealth, HTA, and ERS.

REPLY TO ONE HUNDRED AND SECOND ONMIBUS  
OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH  
OF PUERTO RICO, PUERTO RICO HIGHWAYS AND TRANSPORTATION  
AUTHORITY, AND EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT  
OF THE COMMONWEALTH OF PUERTO RICO TO DEFICIENT CLAIMS ASSERTING  
INTEREST BASED ON SALARY DEMAND, EMPLOYMENT OR SERVICES PROVIDED

TO THE HONORABLE COURT:

**COMES NOW**, Creditor Aracelis Nazario (aka Aracelis Enid Nazario Torres, Aracelis E Nazario Torres and Aracelis Nazario Torres), phone number 787-379-0878 and 787-759-7873, mailing address: PO Box 361204, San Juan Puerto Rico 00936-1204 and email address: [aracelisnid@yahoo.com](mailto:aracelisnid@yahoo.com) and respectfully states and prays as follows:

1. On May 7<sup>th</sup>, 2018, creditor Aracelis Nazario (hereinafter, Ms. Nazario) filed POC #11823 to recover the amount of \$70,000 of money invested in the *Employees Retirement System of the Government of the Commonwealth of Puerto Rico* by conduct of UBS Financial Services on June 4<sup>th</sup>, 2009. (See exhibit, **CUSIP #29216MAC4**).

2. Debtor notified an objection against Ms. Nazario claim alleging a deficient filing of creditor Aracelis Nazario's POC 11823. The objection states that *Proof of claim purports to assert liabilities associated with the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for*

Aracelis E Nazario Torres  
POC #11823

*asserting a claim against the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Employees Retirement System of the Government of the Commonwealth of Puerto Rico or any of the other Title III debtors. (See docket entry no. 9552)*


3. Creditor Ms. Nazario is attaching to this motion evidence in support of her claim no. 11823 in the amount of \$70,000.00 filed on May 7<sup>th</sup>, 2018. Moreover, she has complied with all the requirements set forth in the Exhibit C of the objection filed under docket entry no. 9552.

**WHEREFORE**, creditor Aracelis Nazario (aka Aracelis Enid Nazario Torres, Aracelis E Nazario Torres and Aracelis Nazario Torres), respectfully requests that this Honorable Court takes notice of the preceding facts and deny the *One Hundred and Second Omnibus Objection (non-substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interest Based on Salary Demand, Employment or Services Provided* filed under docket entry no. 9552.

**RESPECTFULLY SUBMITTED**

In Caguas, Puerto Rico, this 13<sup>th</sup> day of January 2020.

**CERTIFICATE OF SERVICE:** I certify that on this same date the foregoing document has been served through first class mail to the following persons of interest: Proskauer Rose LLP, Eleven Times Square New York NY 10036 A/A Martin J Bienenstock, Brian S Rosen, Clerk's Office, Tribunal de Distrito de los EEUU, Room 150 Federal Building, San Juan PR 00915-1767 and Paul Hastings LLP 200 Park Ave New York NY 10166 A/A Luc A Despins, James Bliss, James Worthington and G. Alexander Bongartz.

  
**Aracelis Nazario Torres - Creditor**  
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